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May 9, 2018

VIA ECF
The Honorable I. Leo Glasser
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Goldstein et al v. Arab Bank, PLC, 1:16-CV-01681 (ILG) (RML)

Dear Judge Glasser:

We represent Defendant Arab Bank plc in the above-referenced action and write pursuant to Your Honor's Individual Rule IV to propose a briefing schedule for a dispositive motion.

The Defendant intends to file a motion to dismiss the recently filed Amended Complaint (ECF No. 32) pursuant to Fed. R. Civ. P. 12(b)(2) and 12(b)(6). The parties have discussed the proposed motion and jointly propose the following schedule to govern the briefing:

- <u>June 15, 2018</u>: Defendant to serve and file its notice of motion together with supporting submissions and memorandum of law;
- <u>July 19, 2018</u>: Plaintiffs to serve and file their responsive papers together with supporting submissions and memorandum of law;
- August 8, 2018: Defendant to serve and file its reply papers together with supporting submissions and memorandum of law.

We appreciate the Court's consideration and respectfully request Your Honor's endorsement of this schedule.

Very truly yours,

DLA Piper LLP (US) /s/Jonathan Siegfried Jonathan Siegfried

cc: Magistrate Judge Robert M. Levy All counsel of record

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